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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$60,250.00 U.S. CURRENCY, *in rem*,

Defendant.

1:21-mc-852
UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted John Kolego, attorney for claimant Kyle Miller-Masel, who concurs with this extension.

On May 17, 2021, Kyle Miller-Masel filed a claim in a non-judicial civil forfeiture proceeding by the Drug Enforcement Administration to \$60,250.00, a portion of the \$62,750.00 U.S.C. seized from Kyle Miller-Masel on or about September 26, 2020.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Kyle Miller-Masel, agree to extend the time in which the United States will file a complaint for forfeiture against the

\$60,250.00, a portion of the \$62,750.00 U.S.C., or to obtain an indictment alleging that the assets are subject to forfeiture. Kyle Miller-Masel agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Thursday, October 14, 2021.

Kyle Miller-Masel agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until October 14, 2021, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Kyle Miller-Masel shall not seek its return for any reason in any manner.

DATED: July 30, 2021

Respectfully submitted,

SCOTT E. ASPHAUG
Acting United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period and a proposed Order on the party herein by sending via email on July 30, 2021 to:

John Kolego
JohnKolego@yahoo.com
Attorney for claimant Kyle Miller-Masel

s/Dawn Susuico
DAWN SUSUICO
Paralegal